



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
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KANSAS CITY, KANSAS 66115

RECEIVED

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PRMT-SECTION

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MEMORANDUM

SUBJECT: Comments on Monsanto's PCB Method "Procedure for Rapid Extraction and Analyses of Aroclor Formulations (A1232, A1016, A1242, A1248, A1254, A1260 and A1262) Using Ultrasonically Aided Extraction of Solids

TO: Pat Reitz, Civil Engineer
RCRA/PRMT

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THRU: Mary McGhee, Section Chief *LM for*
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R00107254

RCRA RECORDS CENTER

The subject method was reviewed and should allow the lab to successfully analyze samples for Aroclors (PCB's). However, there appear to be several items which are not included or fully documented in the method. These items are outlined below:

Page 5, Section 6. - This section does not specify applicable holding times, if any, from sample collection to extraction for environmental samples.

Page 7, Section 8. - This section does not indicate the specific corrective action for the initial calibration analyses if acceptance criteria is not met. Also, it appears to only address the initial calibration and not continuing calibrations. The frequency, acceptance criteria, and corrective action for continuing calibrations should be clearly stated.

Page 10, Section 11. - This section does not indicate the specific acceptance criteria for the matrix spike (MS) and does not outline the corrective action if acceptance criteria is not met. In addition, it does not indicate matrix spike duplicates (MSD) are to be analyzed. The analysis of MSD's are recommended at the same frequency as the MS. The analysis of MS samples will provide useful accuracy data but not precision data. The analysis of MSD's would provide the precision data. The acceptance criteria, corrective action, and calculations to be utilized for the MS (and MSD) should be clearly stated.

The above items are generally clarification items and not problems with the analytical procedure itself. If you have any questions regarding my comments or if you need further assistance, please do not hesitate to contact me at extension 5144.